



# DEPARTMENT OF PUBLIC SERVICES

128 North Second Street · Fourth Floor Courthouse · Yakima, Washington 98901

(509) 574-2260 In-State 1-800-572-7354 • FAX (509) 574-2231 • [www.co.yakima.wa.us](http://www.co.yakima.wa.us)

VERN M. REDIFER, P.E., Director

December 17, 2015

Joan Davenport, AICP  
City of Yakima  
129 N. 2<sup>nd</sup> Street  
Yakima, Washington 98901

Dear Mrs. Davenport:

SUBJECT: Review of the Draft MDNS and Traffic Study for the SOZO Sports Multi-Sport Complex

Yakima County has reviewed that draft Mitigated Determination of Non-significance (MDNS) and have the following comments:

1. The MDNS should address all impacts to the natural and built environments, including construction of onsite and offsite improvements required for the project. This includes, but is not limited to, impacts to the floodplain/floodway from road improvements, traffic impacts on nearby local access roads, etc.
2. Under the Findings #7 of the MDNS it states that, "all proposed road and utilities for development of Phase 1 are located outside of the 100-year floodplain, and any critical areas," however what about additional phases?
3. Page 3 of the MDNS states that Yakima County has jurisdiction over the three intersections on Ahtanum Rd. within the study area. Yakima County has jurisdiction over the intersections at S. 38<sup>th</sup> and S.52<sup>nd</sup>, but not the intersection of S.16<sup>th</sup>.
4. The Traffic Impact Analysis (TIA) has several required revisions:
  - a. The TIA states that the site is located in a "predominately rural area". The site is actually located within the City of Yakima and is not in a rural area or setting. As such the proposed project should provide provisions for other modes of transportation including walkers/joggers and bicycles. There is no analysis of alternative modes of travel in the document.
  - b. The TIA refers to two access points into the site, however the site plans shows three access points. The trips distribution should be re-evaluated based on the three access points.
  - c. The study did not address the intersections that are immediately adjacent to the site. S. 38<sup>th</sup> @ Sorensen and Sorenson @ S.36<sup>th</sup> for operation and delay due to the proposed alignment revisions and additional traffic volumes.

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- d. The TIA did not address additional delays and impacts to Springcreek Rd. @ S.40<sup>th</sup>, Springcreek Rd. @ S.41<sup>st</sup>, Springcreek Rd @ S. 44<sup>th</sup>, Springcreek Rd @ S. 45<sup>th</sup>, Springcreek Rd @ S. 47<sup>th</sup>, S. 38<sup>th</sup> @ W. Larch Ave and S. 38<sup>th</sup> @ Oak Ave. for impacts and delays to the existing residences.
  - e. The TIA did not provide any roadway capacity analysis, only intersection capacity was provided. The existing configuration of S. 36<sup>th</sup>, S.38<sup>th</sup> and Sorensen may not be able to handle the additional trips without improvements.
  - f. S. 38<sup>th</sup> @ Ahtanum was identified in the TIA as requiring signalization. Yakima County does not believe that signalization of this intersection provides any benefit to the overall transportation system. It will add additional delay to traffic using Ahtanum Road in favor of the traffic accessing the new sports complex. Yakima County requested that the site be accessed by an extension of Occidental Road from S. 52<sup>nd</sup> to S.38<sup>th</sup>. This connection was not addressed in the TIA. The signalization of S.38<sup>th</sup> @ Ahtanum Road may be considered if the signal is temporary (installed on spanwire) and with the understanding that when the extension of Occidental is completed that the signal hardware will be relocated to the intersection of S.52<sup>nd</sup> and Ahtanum. The required widening of Ahtanum Road to accommodate the left turn lane at S.38<sup>th</sup> will be required to be designed and constructed to Yakima County standards by the project proponents.
5. Section B, Transportation will be required to be modified to reflect the revision to the TIA.
  6. The phasing of the project will need to be revisited based the fact that the TIA assumed that there were no roadway capacity issues on the roadways adjacent to the site. However, it is evident that S.36<sup>th</sup> and Sorensen cannot accommodate that increased traffic and that improvements will be required. Because of the required construction on these roadways the only access will be via S.36<sup>th</sup>. This will require revisions to the phasing plan and the timing of the proposed improvements.
  7. The conclusions will need to be modified to address the above revisions.

If you have any questions please let us know.  
Sincerely,

  
Gary N. Ekstedt, P.E.  
County Engineer

  
Lynn Deitrick, AICP  
Planning Official

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*Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, nation origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.*

*If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2300 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll free relay service 1-800-833-6388 and ask the operator to dial 509-574-2300.*



February 23, 2016

# Public Services

128 North Second Street • Fourth Floor Courthouse • Yakima, Washington 98901  
(509) 574-2300 • 1-800-572-7354 • FAX (509) 574-2301 • [www.co.yakima.wa.us](http://www.co.yakima.wa.us)

VERN M. REDIFER, P.E. - Director

Mr. Matt Hughart, AICP  
Kittelson & Associates, Inc.  
610 SW Alder Street  
Suite 700  
Portland, Oregon 97205

Dear Mr. Hughart:

**SUBJECT: SOZO Sports of Central Washington  
Transportation Impact Analysis – Supplemental Analysis**

We have reviewed your supplemental analysis for the above project and have the following comments:

1. The supplemental analysis talks about the operation of eight soccer fields by spring of 2016. Neither the report nor the associated maps clearly identifies the eight field that will be operated in phase 1 of construction. Please clarify the location of the eight soccer fields that will be open and in operation in the spring of 2016.
2. Delay to roadways intersecting Spring Creek Road. Yakima County had requested additional analysis to determine the impacts to the residences accessing Spring Creek Road from S. 40<sup>th</sup> Avenue, S. 41<sup>st</sup> Avenue, S. 44 Avenue, S. 45<sup>th</sup> Avenue and S 47<sup>th</sup> Avenue. You provided Level-of-Service analysis for these intersections, but what was requested was the amount (or percent) of increased delay at these intersections. Please provide the amount of increased delay at these intersections.
3. The intersection of S. 38<sup>th</sup> Avenue and Sorenson Road has been analyzed as a yield condition. Yakima County will not operate this intersection as a yield. The yield does not adequately assign the right-of-way to all movements in the intersection. This intersection will need to be re-analyzed with stop control.
4. The intersection of S. 36<sup>th</sup> Avenue and Sorenson Road has been analyzed as a continuous movement. Yakima County has previously indicated that the geometry is not adequate for this to operate in this configuration. The recommendation was made to make this a "T" intersection to accommodate the lack of curve radius. Either this intersection will need to be re-analyzed as a "T" intersection or additional right-of-way will need to be dedicated in order to construct curves that meet AASHTO standards for a 25 MPH design speed.

*Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.*

*If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2300 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll free relay service 1-800-833-6388 and ask the operator to dial 509-574-2300.*

5. It appears that the intersection of Ahtanum and S. 38<sup>th</sup> Avenue will require signalization for the operation of the eight fields during the construction of S. 36<sup>th</sup> Avenue. Given the fact that The City of Yakima is scheduled to go to construction of S. 36<sup>th</sup> Avenue in 2016 and that signal plans have been prepared or approved. Please identify how many fields can be in operation with no traffic signal and S. 36<sup>th</sup> Avenue under construction.

Please let me know if you have any questions or require any clarification.

Sincerely,



Kent L. McHenry, P.E.  
Transportation Engineering Manager

**Peters, Jeff**

**From:** Matt Hughart <MHUGHART@kittelson.com>  
**Sent:** Wednesday, March 02, 2016 7:01 AM  
**To:** Davenport, Joan; Sheffield, Brett; Peters, Jeff; Leanne Liddicoat  
**Subject:** Fwd: Updated Yakima Tables

Joan,

Here are a revised set of Tables 2 and 3 from our response memo that addresses the change in delay along the Spring Creek Road intersections. Please review and forward to Kent if you have no further questions. Per our discussion on Monday, we will not prepare responses to the other questions in Kent's e-mail. Please let me know if you need anything else.

Matt Hughart, AICP  
Kittelson & Associates, Inc.  
503-228-5230

Begin forwarded message:

**From:** Zachary Bugg <zbugg@kittelson.com>  
**Date:** March 2, 2016 at 6:51:24 AM PST  
**To:** Matt Hughart <MHUGHART@kittelson.com>  
**Subject:** Updated Yakima Tables

**Table 2 - Spring Creek Road Delay Analysis – Partial 8-Field Build-out**

		Spring Creek / 40th		Spring Creek / 41st		Spring Creek / 44th		Spring Creek / 45th		Spring Creek / 47th	
Number of Houses Served		6		16		25		4		23	
Existing Conditions											
Time Period		PM	SAT	PM	SAT	PM	SAT	PM	SAT	PM	SAT
Northbound Approach LOS		A	A	A	A	A	A	A	A	A	A
Northbound Approach Delay (sec)		8.8	8.7	8.9	8.7	8.9	8.7	9.1	8.6	8.9	8.6
Partial 8-Field Build-out											
Trip Generation	In	4	3	10	8	16	13	3	2	14	12
	Out	2	3	6	7	9	11	1	2	9	10
Northbound LOS		A	A	A	A	A	A	A	A	A	A
Northbound Approach Delay (sec)		9.3	9.3	9.5	9.2	9.4	9.3	9.8	9.1	9.5	9.2

**Table 3 - Spring Creek Road Delay Analysis – Full Site Build-out**

	Spring Creek / 40th		Spring Creek / 41st		Spring Creek / 44th		Spring Creek / 45th		Spring Creek / 47th	
Number of Houses Served	6		16		25		4		23	
Existing Conditions										
Time Period	PM	SAT	PM	SAT	PM	SAT	PM	SAT	PM	SAT
Northbound Approach LOS	A	A	A	A	A	A	A	A	A	A
Northbound Approach Delay (sec)	8.8	8.7	8.9	8.7	8.9	8.7	9.1	8.6	8.9	8.6

Full Site Build-out											
Trip Generation	In	4	3	10	8	16	13	3	2	14	12
	Out	2	3	6	7	9	11	1	2	9	10
Northbound LOS		A	A	A	A	A	A	A	A	A	A
Northbound Approach Delay (sec)		9.4	9.6	9.5	9.6	9.5	9.6	9.8	9.4	9.5	9.5

Zachary Bugg, PhD, EI  
Engineering Associate

Kittelson & Associates, Inc.  
Transportation Engineering / Planning  
36 South Charles Street, Suite 1920  
Baltimore, Maryland 21201  
410.347.9610  
443.524.9413 (direct)

[Streetwise](#) [Twitter](#) [Facebook](#)

<image001.jpg>

## Peters, Jeff

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**From:** Davenport, Joan  
**Sent:** Thursday, February 25, 2016 4:28 PM  
**To:** Matt Hughart; Kent McHenry (kent.mchenry@co.yakima.wa.us); Sheffield, Brett; Peters, Jeff  
**Cc:** Leanne Liddicoat  
**Subject:** City of Yakima response to Yakima County traffic comments

These remarks are in response to the letter from Kent McHenry, dated February 23, 2016 related to comments from the Kittelson Associates Supplemental Traffic Analysis for the SOZO Sports Complex. I do not see that any of Kent's questions would require additional analysis by Matt – I am providing my responses. Matt and others, please feel free to weigh in. Jeff Peters and I are waiting to hear from the group to see if we are "good to go" on the analysis.

1. Supplemental Traffic Analysis does not identify location of up to 8 fields in Phase 1: *An updated site plan will be provided.*
2. Delay to side streets & intersections with Spring Creek Road – *Table 2 of the supplemental report lists by intersection the number of added trips to each of the side streets (40<sup>th</sup> Ave, 41<sup>st</sup> Ave, 44<sup>th</sup> Ave, 45<sup>th</sup> Ave and 47<sup>th</sup> Ave). The report concludes that all streets will continue to operate at Level of Service "A". Appendix A included the detail work sheets.*
3. Concern about YIELD control at 38<sup>th</sup> Ave & Ahtanum Rd. *The proposed SEPA MDNS includes the requirement for construction of a "T" intersection design at 38<sup>th</sup> Ave and Sorenson Road. Installation of STOP control is appropriate. No additional analysis is requested from Kittelson Associates. Yakima County Public Works will dictate the appropriate design, and right of way for street construction, which the City will install with the support of SIED funds.*
4. The intersection of 36<sup>th</sup> Avenue and Sorenson Road *will be constructed to Yakima County specifications. No additional traffic analysis is requested from Kittelson Associates.*
5. How many fields can be played without a traffic signal at 38<sup>th</sup> Ave & Ahtanum? *The Traffic Analysis states "Based on an iterations analysis, it was concluded that signalization and associated widening of Ahtanum would be needed at the equivalent of 12 or more soccer fields.*

Joan Davenport, AICP  
Director of Community Development  
City of Yakima  
129 North 2<sup>nd</sup> St  
Yakima, WA 98901  
[Joan.davenport@yakimawa.gov](mailto:Joan.davenport@yakimawa.gov)  
(509)576-6417

December 15, 2015

To: Jeff Peters, Supervising Planner

From: Glenn Denman, Building Official

Re: CL2#014-15 Sozo Sports Complex

Code reference: 2012 International Building Code (IBC), Yakima Municipal Code (YMC)

Where parking is proposed, accessible parking shall be provided in each parking lot, and each lot shall be calculated for accessible parking individually per section 1106.1 of the IBC.

Approved plumbing facilities shall be provided and shall be connected to the City of Yakima sanitary sewer system per YMC 7.65.030 (E).

A site plan and building plans shall be submitted for review and approval prior to the issuance of permits.

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# City of Yakima Engineering

## Memorandum

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Date: December 9, 2015

To: Jeff Peters  
Supervising Planner

From: Randy Meloy  
Surface Water Engineer

Subject: CL2#014-15  
SOZO

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Jeff,

As this project involves clearing or grading one acre or more, a Stormwater Site Plan shall be required from the applicant. The main components of a Stormwater Site Plan are:

- **Drainage plan(s) and calculations**
- **Stormwater maintenance agreement and plan**
- Proof that the maintenance agreement was **recorded** in the Yakima County Auditor's Office
- **Stormwater Pollution Prevention Plan (SWPPP) or Erosivity Waiver** (Erosivity Waiver Certificate Statement required)

The applicant is advised to read Chapter 7.83 of the Yakima Municipal Code to obtain all appropriate information concerning the Stormwater Site Plan and Chapter 7.82 for information concerning the Stormwater Pollution Prevention Plan.

Grading and/or building permits shall not be issued without an approved Stormwater Site Plan.

Complete stormwater design plans, specifications and runoff/storage calculations supporting the stormwater design are required pursuant to the Eastern Washington Stormwater Manual and City of Yakima standards. These plans and control measures must be completed by a licensed Professional Engineer and then be reviewed and approved by the City of Yakima Surface Water Engineer prior to construction.

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The project site has a very shallow groundwater table and the drainage design shall meet the requirements of the Stormwater Management Manual for Eastern Washington, including the Site Suitability Criteria in Chapter 5. The base of all infiltration basins should be at least five feet above the seasonal high-water mark, bedrock (or hardpan) or other low permeability layer. A minimum separation of three feet may be considered if a groundwater mounding analysis is judged to be adequate to prevent overtopping and to meet the site suitability criteria specified in Chapter 5. Due to the shallow groundwater table, drainage systems may be limited to very shallow infiltration/bio-infiltration ponds and/or swales.

#### UIC Registration - Stormwater

In accordance with Chapter 2 Section 2.4 of the December 2006 edition of the Department of Ecology's Guidance for UIC Wells that Manage Stormwater Publication Number 05-10-067, Underground Injection Control (UIC) wells constructed on or after February 3, 2006 are considered new and must be registered with the Department of Ecology (DOE) prior to construction.

A Construction Stormwater General Permit may be required from the Washington State Department of Ecology. The applicant should contact the Department of Ecology to determine if this permit is required. Due to recent changes by the Department of Ecology to the permit, Ecology will no longer accept paper copies of the "Notice of Intent for Construction Activity". Applicants should refer the Ecology construction stormwater web page at <http://www.ecy.wa.gov/programs/wq/stormwater/construction/enoi.html>.

Randy Meloy  
Surface Water Engineer  
City of Yakima  
(509) 576-6606

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**Peters, Jeff**

---

**From:** Latham, Ray (ECY) <RLAT461@ecy.wa.gov>  
**Sent:** Thursday, December 03, 2015 5:23 PM  
**To:** Peters, Jeff  
**Cc:** Clear, Gwen (ECY)  
**Subject:** Cleat City LLC (SOZO soccer fields) CL2 014-15, CAO 003-15, SEPA 035-15  
**Attachments:** SWPPP\_Sep22.DOC

I noted in the soccer fields SEPA 035-15 document at A.10 an acknowledgment that a stormwater permit would be obtained. May I presume that this is an NPDES Construction Stormwater Permit?

This project includes clearing and leveling of about 120 ac. with several structures to be built. The NRCS Soils Survey indicates the local soil types have a depth to groundwater between 0 – 48 inches throughout the project area. The rest of the document emphasizes that no stormwater will discharge off-site by use of infiltration, nor is there a necessity for dewatering. The use of the Stormwater Management Manual for Eastern WA for a stormwater infiltration structure prescribes a separation of 5 ft. between the bottom of the structure and the shallow water table to protect ground water quality.

A side drainage channel of Bachelor Cr. bisects the property. Culverts indicating an active channel are installed under 36<sup>th</sup> Ave near the corner with Spring St. by the airport property and under 52<sup>nd</sup> Ave just south of the property at 2211 52<sup>nd</sup> Ave. Caution will need to be exercised to not allow a discharge of stormwater or dewatering to this waterway.

A very effective way of reducing wind and water erosion is limit the ground clearing and disturbed acreage to a minimum. Do they need 120 acres of dust when they only work on a 10 ac. parcel?

\*\*\*\*\*

Ray Latham, CPSWQ  
Stormwater Inspector  
Water Quality Section  
509.575.2807

**Our new address is:**

**1250 W. Alder Street,  
Union Gap, WA 98903.**

**Phone numbers will remain the same.**

**REED C. PELL LAW OFFICES**  
**7 SOUTH THIRD AVENUE**  
**YAKIMA, WA 98902**  
**1-509-952-3669 Telephone**  
**1-509-972-9010 Fax**  
**[rcphousing@hotmail.com](mailto:rcphousing@hotmail.com)**

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CITY OF YAKIMA  
COMMUNITY DEVELOPMENT

November 30, 2015

Community Development Department  
Planning Division  
129 North Second Street  
2<sup>nd</sup> Floor  
Yakima, WA 98901  
Attn: Joan Davenport AICP, Community Development Director

Re: File Numbers CL2#015-15, CAO#003-15, & SEPA #035-15

Dear Ms. Davenport:

This letter is being submitted on behalf of Valley Quality Homes of Spokane LLC and in response to your request for written comments regarding the above file numbers. Please treat this letter as a request that I be provided at the above address with all decisions issued in the file numbers and any future notices issued therein.

The following comments are being submitted for review and consideration, to-wit:

1. The comments contained in my letter of November 12, 2015, a copy of which is attached hereto, are submitted as comments in this matter.
2. Clearly improvements need to be made to the intersection of Springcreek Road and West Washington Avenue. It appears the only improvement being recommended by Kittleson & Associates, Inc. is a exclusive lane for right turning vehicles. What about the vehicles that want to turn left on to West Washington Road? What about the back up of vehicles on West Washington Avenue traveling West and wanting to turn left onto Springcreek Road? It is submitted that this intersection is as much of need, if not more in need, of signalization as the intersection at South 38<sup>th</sup> Avenue and Lower Ahtanum.
3. In reviewing the Decision rendered by the City of Yakima in project numbers PSP#014-15 and CAO#002-15, paragraph 10 of the Decision requires that "Sorenson Rd. E. of S. 38<sup>th</sup> Avenue and S. 36<sup>th</sup> Avenue shall be fully improved with curb, gutter, sidewalk, and streets lights in

accordance with YMC 12.06.070 and 12.06.080." Assuming this only refers to that portion of South 36<sup>th</sup> Avenue that the subject property has frontage on, then a condition of the pending applications should be the improvement of that portion of South 36<sup>th</sup> Avenue that lies North of the subject property together with Springcreek Road and consistent with Title 12 requirements.

4. The Environmental Checklist states that "No groundwater will be drawn". The entire project is going to be irrigated with Nob Hill Water? I don't think so. To the extent the Applicant intends to use groundwater to irrigate the soccer fields, then evidence needs to be presented as to the nature and extent of its rights to withdraw groundwater for recreational purposes, if any, how much water is going to be withdrawn, etc etc
5. The property surrounding this development is zoned residential and there is a complete absence of any study as to the negative effects a development of this size will have on the surrounding residential property and what, if anything, can be done to mitigate noise, light, etc

It is clear to the undersigned that this project is being fast tracked and that further studies and investigation are necessary before a final decision can be made as to whether this project is really in the best interests of the Public. Let's not loose sight of the fact that Cleat City, LLC, the owner of the parcels involved in this project, appears to be a profit LLC.

Sincerely yours:

  
Reed C. Pell

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**REED C. PELL LAW OFFICES  
7 SOUTH THIRD AVENUE  
YAKIMA, WA 98902  
1-509-952-3669 Telephone  
1-509-972-9010 Fax  
rcphousing@hotmail.com**

November 12, 2015

Community Development Department  
Planning Division  
129 North Second Street  
2<sup>nd</sup> Floor  
Yakima, WA 98901  
Attn: Joan Davenport AICP, Community Development Director

Re: File Numbers PSP #015-15 and CAO #002-15

Dear Ms. Davenport:

This letter is being submitted on behalf of Valley Quality Homes of Spokane LLC and in response to your request for written comments regarding the above file numbers. Please treat this letter as a request that I be provided at the above address with decisions issued in this matter and any future notices.

The following comments are being submitted for review and consideration, to-wit:

1. The Applicant seeks to short plat approximately 118 acres into nine lots. Sixty acres of the property, the western portion thereof, is zoned Suburban Residential which would permit residential densities of up to seven units per net residential acre. The comment period expires on November 12, 2015. Just yesterday, we received another Notice of Application and Environmental Review with a comment due date of November 27, 2015. Under the circumstances, we would request that the comment period for the above files be continued to the comment due date on the just received Notice of Application and Environmental Review. This piece meal development of such a project should not be tolerated and one wonders why it is being pursued in this manner. In addition, considering the fact that the City is in fact a partner in this venture, and will for all intents and purposes be acting upon applications that it has a vested interest in, the City should require a full public hearing on the project so that the entire project can be vetted in an orderly process and that the public can rest assured that the City is not simply jumping

through hoops for a project that has already been given a stamp of approval. The nature and size of this development merits a public hearing. I have been involved in land development for twenty plus years and I have NEVER seen a short plat application submitted on one day, in this case on October 16, 2015, and it be deemed to be complete the next day, in this case on October 17, 2015.

2. The application for a Short Plat in this matter infers and/or suggests that development standards either (1) don't apply because the property is being short platted for financial segregation purposes, or (2) should be deferred to a future date. I am not aware of any law, statute, or ordinance that permits the City to waive required development standards. The pending short plat is subject to all of the requirements of Title 12, including but not limited to, improved streets, sidewalks, curbs, gutters, streetlights; and the extension of the sewer main to the western boundary of the property being short platted. The pending application does not address any of these requirements and how they were deemed complete for processing is a mystery to me. If I heard it once, I have heard it a hundred times from representatives of the City, the sewer main must be extended "to and through" the property being developed. I have been involved in two lot subdivisions where the cost of extending the sewer main was going to far exceed the anticipated fair market value of the two lots being developed and the response from the City has been "Oh-Well".
3. The pending short plat application does not provide for or even discuss any needed improvements of South 36<sup>th</sup> Avenue, Springcreek Road, or West Sorensen Avenue. It wasn't too long ago that these roads were nothing more than gravel and their current condition isn't much better. No sidewalks, no bicycle lanes, no curbs, no gutters. This is a disaster waiting to happen as some child is bicycling to or from the new proposed park.
4. The pending applications do not take into consideration or discuss what effect the proposed development will have on a 150 lot residential development that Valley Quality Homes of Spokane LLC has obtained preliminary approval for under Yakima County Resolution Number 148-2012 and which has been approved for ingress and egress off of and onto South 38<sup>th</sup> Avenue. Valley Quality Homes of Spokane LLC intends to proceed with the development of its project which borders on the South the real property which the applicant seeks to short plat.

In summary, this proposed project has numerous unanswered questions that demand to be answered and resolved. Valley Quality Homes of Spokane LLC would like to coordinate it's development with that of Sozo Sports of Central Washington and Cleat City LLC and would welcome a meeting of all concerned to discuss the matter in further detail and hopefully arrive at an agreement that benefits everyone.

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Sincerely yours,

Reed C. Bell

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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 25, 2015

Joan Davenport  
Community Development Manager  
City of Yakima  
129 North 2<sup>nd</sup> Street  
Yakima, WA 98901

Re: CL2 014-15, CAO 003-15, SEPA 035-15

Dear Ms. Davenport:

Thank you for the opportunity to comment on the mitigated determination of nonsignificance for the establishment and construction a multi-sport park, proposed by SOZO Sports of Central Washington and Cleat City, LLC. We have reviewed the environmental checklist and have the following comments.

**SHORELANDS/ENVIRONMENTAL ASSISTANCE**

**General Comments:**

Depth to groundwater is an important issue, and no information has been presented in documents which gives any details. Well logs are mentioned, but no data from them is discussed. Understanding how close the water table is to the surface would also help inform critical area review as to where additional wetland information should be gathered. (See comments below on the submitted wetland report.) Depth to groundwater is also important in determining how to size storm-water facilities appropriately. Since floodwater retention and infiltration is likely one of the functions of any wetlands that might be present out there, understanding where the water table is located may also inform how to mitigate for losses of those functions on site due to impermeable parking areas and other structures.

**SEPA Checklist Comments:**

Part B. 1. Asserts that there are no "water streams". However, in section B. 8.b., there is an acknowledgement that there is a mapped wetland area/flood zone starting in the northwest corner of the 58-acre parcel which continues into the 60-acre parcel. The question asks if there are any seasonal streams or wetlands on site. How has the applicant considered the answer to this question in light of the fact that this is an extreme drought year? The proposed drawings show

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Mr. Peters  
November 25, 2015  
Page 2

intrusion of one of the fields into the areas that are mapped as critical areas (AE flood zone?) on the Yakima County GIS system. Impacts to wetlands must be quantified and mitigated. Up to 0.25 acres of wetlands could be located in this corner of the phase 1 parcel if the mapped floodplain area is accurate and has wetland characteristics.

Part B.4. Plants, parts a. and b.: The wetland report mentioned that there were "sporadic" cattails on site. Cattails were not checked in this section.

Part 8.h. The response in the section appears to be putting off critical area report evaluation and compliance to phase 2. Going ahead with phase 1 without knowing exactly where the wetlands are located on site will not be protective of the environment if the wetland report is shown to be wrong in its conclusions.

**Critical Areas Identification Form Comments:**

Part B. 1 asks what the USDA classification of the soils on site might be. The answer given was "10YR 3/3", which is very detailed information that describes soil chroma, but does not answer the question posed. The soils are most likely in the Umapine Series, as all of the soil types listed are of floodplain derivation and either are hydric soils or possibly contain hydric soil inclusions. In section B1.c, four different types of soils are listed as being found at the site. Each of these soil types requires "on site" review to determine whether hydric soils are present. Therefore, it would be my suggestion to at least dig soil pits in each soil type area's lowest point and record the information (as well as plant and hydrology information) on wetland data sheets.

Part B. 3, lists several plants that could be present in wetlands, including quack-grass and willows. It would be more helpful to have Genus and species names for these plants when trying to determine how much and where the potential wetland impacts could be.

**Wetland-Inventory Report by The Wetland Corps, (July 1, 2015)**

The submitted report is not complete and requires more documentation to determine whether the report findings are accurate. More information should be included in the report. Unless the City of Yakima's Critical Areas Ordinance specifies a particular wetland delineation manual to use, Ecology and the Corps of Engineers are using the same manual (1987 manual and the Arid West Supplement) for wetland delineation.

Report language seems to imply that soil pit or data plot analysis occurred only in the area where NWI maps have shown there to be wetlands (NWI maps are only 60 percent adequate). Because this is a disturbed site, the delineation report should include wetland delineation Data Plot forms for multiple areas (even uplands) throughout the site, with potentially more data plots within topographic lows on site. It is not enough to only have two data plots for a site of this size, especially, when in a disturbed floodplain environment where hydric inclusions can be located. There is a statement in the report that the entire site was walked, but there were no details of how this was accomplished. Was the whole site walked in a grid pattern, or were only the lowest

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NOV 30 2015

CITY OF YAKIMA  
PLANNING DIV

Mr. Peters  
November 25, 2015  
Page 3

topographic areas explored? How many soil pits were dug during this reconnaissance? Where were they dug? The report implies that the entire site soils are uniform, yet four different soil units are mapped on site. Without showing where soil sample pits were taken on this large site, it is not detailed enough.

A description of the plants (down to Genus and species) that were growing in the topographic low areas should be given as compared to topographic high/upland areas. If the plant assemblage was different from the plants growing in the more upland areas, was the soil the same? Also, the report mentions the presence of "sporadic cattails"? A description of where the cattails were and some discussion about why these areas are or are not wetlands should be included in the report, since cattails are obligate wetland plants. If the cattails are not in a wetland why are they still growing there?

Climate data should be included, and the fact that we are in an extreme drought year should be discussed in the report as it might impact what was observed on site. Just stating that climate data was considered is not enough. Additional text or data should be presented to show how it was considered. The arid west supplement manual to the US Army Corps Manual mentions this issue in section 5.

There is not much information about the hydrologic regime on site. There is a statement in the report that relic mottling was observed. Data points where those features were observed and how you know that those redoximorphic features are relic should be described in the report. In an extreme drought year in the middle of the summer, I would not expect to see any water near the surface. Also, has the site been ditched or drained?

Ecology would be happy to assist the City with a review of a revised wetland report which addresses the items/issues mentioned above. The extent of wetland locations on site should be resolved before any construction begins and before a final SEPA determination is made.

If you have any questions or would like to respond to these Shorelands/Environmental Assistance comments, please contact **Catherine Reed** at (509) 575-2616 or email at [catherine.reed@ecy.wa.gov](mailto:catherine.reed@ecy.wa.gov).

## **WATER QUALITY**

### Project with Potential to Discharge Off-Site

The NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit is a minimum of a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.

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NOV 30 2015

CITY OF YAKIMA  
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Mr. Peters  
November 25, 2015  
Page 4

The permit requires that Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact **Ray Latham** at the Department of Ecology, (509) 575-2807, with questions about this permit.

### TOXICS CLEAN-UP

Based upon the historical agricultural use of this land, there is a possibility the soil contains residual concentrations of pesticides. Ecology recommends that the soils be sampled and analyzed for lead and arsenic, and for organochlorine pesticides. If these contaminants are found at concentrations above the Model Toxics Control Act cleanup levels Ecology recommends that potential buyers be notified of their occurrence.

If you have any questions or would like to respond to these Toxics Clean-up comments, please contact **Valerie Bound** at (509) 454-7886 or email at [valerie.bound@ecy.wa.gov](mailto:valerie.bound@ecy.wa.gov).

Sincerely,



Gwen Clear  
Environmental Review Coordinator  
Central Regional Office  
(509) 575-2012  
[crosepacoordinator@ecy.wa.gov](mailto:crosepacoordinator@ecy.wa.gov)

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**Washington State  
Department of Transportation**

**Lynn Peterson**  
Secretary of Transportation

**South Central Region**  
2809 Rudkin Road  
Union Gap, WA 98903-1648  
509-577-1600 / FAX: 509-577-1603  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

November 12, 2015

City of Yakima Planning Division  
129 North Second Street  
Yakima, WA 98901

Attention: Joan Davenport, Community Development Director

Subject: CL2#014-15, CAO#003-15, & SEPA #035-15 – Cleat City, LLC

We have reviewed the proposed project and associated Traffic Impact Analysis. The project site is not in the vicinity of any WSDOT-maintained roads and traffic impacts to the state system will be negligible. We have no further comment.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact Rick Holmstrom at (509) 577-1633.

Sincerely,



Paul Gonseth, P.E.  
Planning Engineer

PG: rh/jjp

cc: File

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